

**UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF NEW YORK**

IN RE PAYMENT CARD INTERCHANGE  
FEE AND MERCHANT DISCOUNT  
ANTITRUST LITIGATION

This Document Relates To:

BARRY'S CUT RATE STORES INC.;  
DDMB, INC. d/b/a EMPORIUM ARCADE  
BAR; DDMB 2, LLC d/b/a EMPORIUM  
LOGAN SQUARE; BOSS DENTAL CARE;  
RUNCENTRAL, LLC; CMP CONSULTING  
SERV., INC.; TOWN KITCHEN, LLC d/b/a  
TOWN KITCHEN & BAR; GENERIC  
DEPOT 3, INC. d/b/a PRESCRIPTION  
DEPOT; and PUREONE, LLC d/b/a SALON  
PURE,

Plaintiffs,

v.

VISA, INC.; MASTERCARD  
INCORPORATED; MASTERCARD  
INTERNATIONAL INCORPORATED;  
BANK OF AMERICA, N.A.; BA  
MERCHANT SERVICES LLC (f/k/a  
DEFENDANT NATIONAL PROCESSING,  
INC.); BANK OF AMERICA  
CORPORATION; BARCLAYS BANK PLC;  
BARCLAYS BANK DELAWARE;  
BARCLAYS FINANCIAL CORP.; CAPITAL  
ONE BANK, (USA), N.A.; CAPITAL ONE  
F.S.B.; CAPITAL ONE FINANCIAL  
CORPORATION; CHASE BANK USA, N.A.;  
CHASE MANHATTAN BANK USA, N.A.;  
CHASE PAYMENTTECH SOLUTIONS, LLC;  
JPMORGAN CHASE BANK, N.A.;  
JPMORGAN CHASE & CO.; CITIBANK  
(SOUTH DAKOTA), N.A.; CITIBANK N.A.;  
CITIGROUP, INC.; CITICORP; and WELLS  
FARGO & COMPANY,  
Defendants.

MDL No. 1720

Docket No. 05-md-01720 (MKB-JAM)

**DECLARATION OF LIZ LAMBERT,  
HUNTINGTON NATIONAL BANK**

I, Liz Lambert, declare and state as follows:

1. I am Liz Lambert at The Huntington National Bank (“Huntington”), the escrow agent retained in this matter. The following statements are based on my personal knowledge and information provided to me by Equitable Relief Class Counsel and other Huntington employees working under my supervision and, if called upon to do so, I could and would testify competently thereto.

2. I am Senior Managing Director of Huntington Bank’s National Settlement Team. I began my professional career in fixed income sales at Salomon Brothers Inc. in 1986, after graduating with a B.A. in Business Administration and French from the State University of New York at Albany. I have 37 years of banking experience with officer positions held at National Westminster Bank, Mellon Bank, Comerica Bank/Progress Bank and Citizens Bank. I am also an Associate Member of the American Bar and Philadelphia Bar Associations, and a Member of the American Constitution Society

3. Huntington’s National Settlement Team has over 20 years of experience acting as escrow agents on various cases. We have handled more than 5,500 settlements for law firms, claims administrators, and regulatory agencies. These cases represent over \$75 billion with more than 200 million checks, including some of the largest settlements in U.S. history. Our team has acted as escrow agent for a significant portion of these cases.

4. Huntington Bancshares Incorporated is a \$187 billion asset regional bank holding company headquartered in Columbus, Ohio. Founded in 1866, The Huntington National Bank and its affiliates provide consumers, small and middle-market businesses, corporations, municipalities, and other organizations with a comprehensive suite of banking, payments, wealth management, and risk management products and services. Huntington operates more than 1,000

branches in 11 states, with certain businesses operating in extended geographies. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

5. Appendix B to the Class Settlement Agreement of the Rule 23(b)(2) Class Plaintiffs and the Defendants contains the Class Settlement Escrow Agreement for this matter.

6. Attached to this Declaration is Huntington National Bank's Brochure.

Executed on this 25th Day of March, 2024 in Philadelphia, Pennsylvania.



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Liz Lambert



# SETTLEMENT SERVICES



Connecting Our Customers to Streamlined Settlement Services

Our National Settlement team has handled more than 5,500 settlements for law firms, claims administrators and regulatory agencies. These cases represent over \$75 billion with more than 200 million checks – including some of the largest settlements in U.S. history.

5,500+ Settlements    200M+ Checks    \$75B+ Disbursed

Including these Settlements

\$7.25B  
Payment Card Interchange Fee Settlement Fund

\$4.0B  
Madoff Victim Fund

\$2.9B  
Petrobras Securities Litigation

\$2.4B  
SEC v. Bank of America Securities Settlement

\$2.3B  
FX Benchmark Rates Antitrust Settlement

\$1.5B  
National Mortgage Settlement

\$926M  
Stryker Modular Hip Settlement

\$735M  
U.S. Dept. of Justice Adelphia Victim Remission

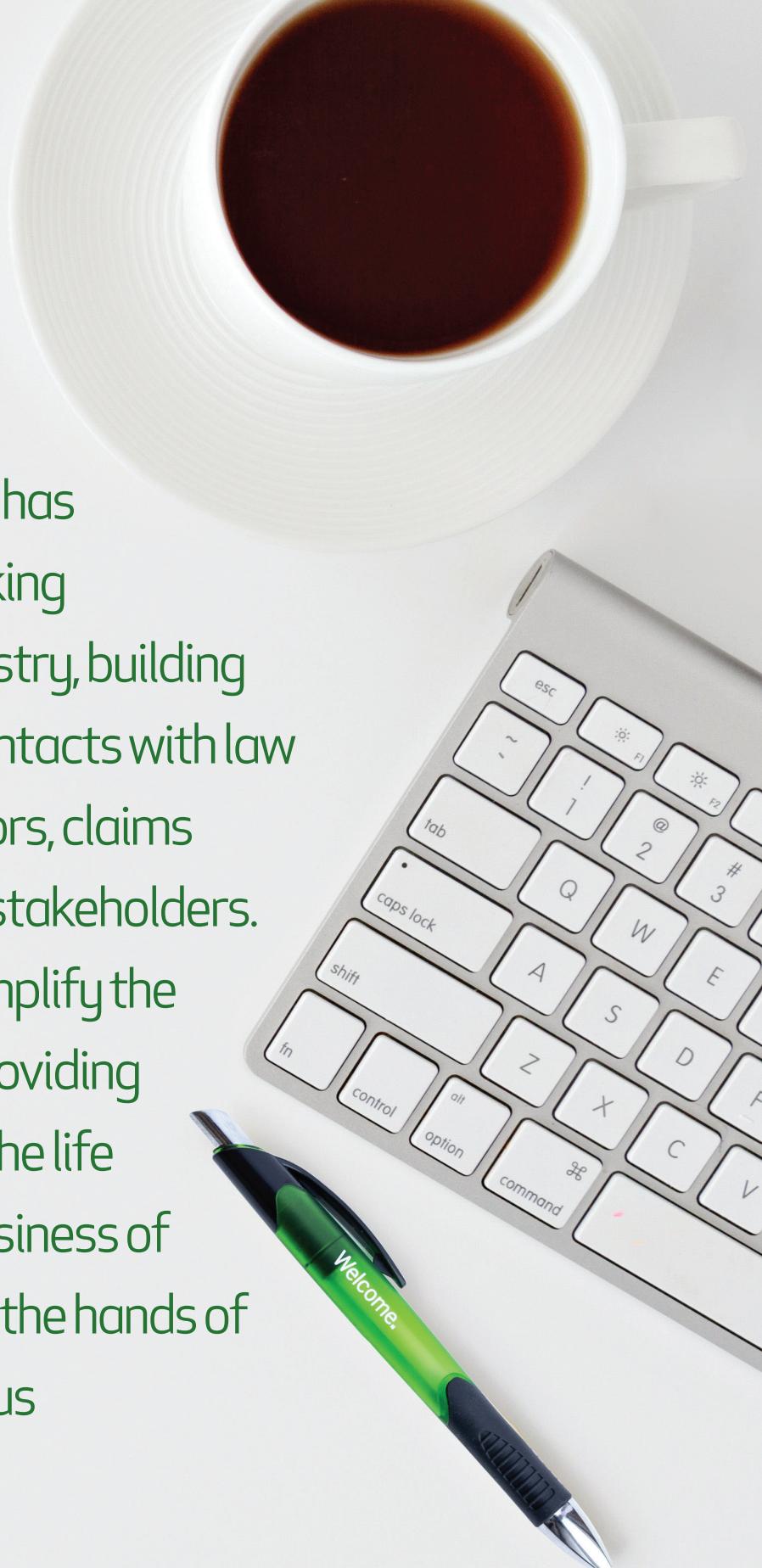
\$525M  
Lehman Brothers Securities Settlement Fund

\$200M  
SEC v. JPMorgan Chase Settlement

\$153M  
HealthSouth Securities

# Experience Matters

The Huntington National Settlement team has spent nearly 20 years working within the class action industry, building an extensive network of contacts with law firms, government regulators, claims administrators, and other stakeholders. We use this expertise to simplify the banking process for you, providing seamless service through the life of a case. By putting the business of settlement fund banking in the hands of our specialists, you can focus on the case at hand.



## Disbursement Services

### BUSINESS ONLINE

View the account balance and transaction history, search for transactions, view check images, place stop payments, initiate wire transfers, set up reports, and more through the same easy-to-navigate platform.

### POSITIVE PAY

Huntington Positive Pay automates daily monitoring for the settlement fund. The claims administrator will transmit the dollar amount, date, payee and other pertinent issue information for each claimant check.

### ACH POSITIVE PAY

With ACH Blocks, you can stop any ACH debit to your account. This can prevent any unauthorized electronic transactions from occurring on your account.

## Investment Options

Huntington can provide a variety of investment options<sup>1</sup> for the settlement fund escrow account:

[FDIC Pass-Through Insured Accounts](#)

[IntraFi Cash Service<sup>SM</sup>\(ICS\)<sup>2</sup>](#)

[U.S. Treasury Money Market Mutual Fund](#)

[Government Obligations Money Market Mutual Fund](#)

[Treasury Bills](#)

[U.S. Government Securities](#)

## Settlement Phases

At Huntington we will work with you from the first deposit to the last disbursement, providing customized solutions for both the Escrow and Distribution phases:

### ESCROW PHASE

Investment options backed by the full faith and credit of the U.S. Government

Broad network of law firms, regulators and claims administrators

Proven track record with a \$9 billion escrow portfolio

Seamless integration from escrow through distribution

### DISTRIBUTION PHASE

Fraud protection services

Master agreements to simplify the process

Advance Reporting Tools

Extensive experience with over 5,500 cases

Digital Payment Services



## Commitment to the Industry

We support numerous legal and trade organizations in the industry, often in leadership positions. We helped organize three national conferences to share best practices among law firms, claims administrators, custodians and regulators. Groups we support include:

[American Antitrust Institute \(AAI\)](#)

[American Association for Justice \(AAJ\)](#)

[American Constitution Society \(ACS\)](#)

[Committee to Support the Antitrust Laws \(COSAL\)](#)

[Institute for Law and Economic Policy \(ILEP\)](#)

[National Association of Shareholder & Consumer Attorneys \(NASCAT\)](#)

[Public Interest Law Center](#)

[Public Justice Foundation](#)

[Women Antitrust Plaintiffs' Attorneys \(WAPA\)](#)

Huntington National Settlements Actively Serving

50  
STATES

The Huntington National Bank Full-service Footprint

11  
STATES

### GET CONNECTED

Reach out to our Huntington National Settlement team about your next settlement case.

 **Rose Clark**  
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Huntington Bancshares Incorporated is a regional bank holding company headquartered in Columbus, Ohio, with \$187 billion of assets and a network of more than 1000 full-service branches. Founded in 1866, The Huntington National Bank and its affiliates provide consumer, small business, commercial, treasury management, wealth management, brokerage, trust, and insurance services. Huntington also provides auto dealer, equipment finance, national settlement and capital market services that extend beyond its core states.

1 Securities products and services are offered by licensed securities representatives of Huntington Securities, Inc., registered broker dealer and member FINRA/SIPC. Trust and certain investment management products and services are provided by The Huntington National Bank, a national bank with fiduciary powers. Huntington Securities, Inc. and The Huntington National Bank are wholly owned subsidiaries of Huntington Bancshares Incorporated.

2 Deposit placement through CDARS or ICS is subject to the terms, conditions, and disclosures in applicable agreements. Although deposits are placed in increments that do not exceed the FDIC standard maximum deposit insurance amount ("SMDIA") at any one destination bank, a depositor's balances at the institution that places deposits may exceed the SMDIA (e.g., before settlement for deposits or after settlement for withdrawals) or be uninsured (if the placing institution is not an insured bank). The depositor must make any necessary arrangements to protect such balances consistent with applicable law and must determine whether placement through CDARS or ICS satisfies any restrictions on its deposits. A list identifying IntraFi network banks appears at <https://www.intrafi.com/network-banks>. The depositor may exclude banks from eligibility to receive its funds. IntraFi and ICS are registered service marks, and IntraFi Cash Service is a service mark, of IntraFi Network LLC.

When placing your deposits using ICS or CDARS, The Huntington National Bank acts as your agent and not as your investment advisor. Your funds placed by The Huntington National Bank using ICS or CDARS are placed into deposit accounts at other IntraFi network banks and are the deposit obligation of those banks.

**Investment, Insurance and Non-Deposit Trust products are:**

**NOT A DEPOSIT • NOT FDIC INSURED • NOT GUARANTEED BY THE BANK**  
**• NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY • MAY LOSE VALUE**

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